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*Counsel for Movant Bridgestone Investment
 Corporation Limited and Proposed Lead Counsel for the Class*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

KALMAN ISAACS, individually and on
 behalf of all others similarly situated,

Plaintiff,

v.

ELON MUSK and TESLA, INC.,

Defendants.

)
) Case No. 3:18-cv-004865-EMC
)
) CLASS ACTION
)
) SECOND DECLARATION OF RAMZI ABADOU
) IN FURTHER SUPPORT OF BRIDGESTONE
) INVESTMENT CORPORATION LIMITED'S
) MOTION FOR: (I) CONSOLIDATION OF
) RELATED ACTIONS; (II) APPOINTMENT AS
) LEAD PLAINTIFF; AND (III) FOR APPROVAL
) OF ITS SELECTION OF LEAD COUNSEL
)
) Judge: Hon. Edward M. Chen
) Date: November 15, 2018
) Time: 1:30 p.m.
) Courtroom: Courtroom 5 – 17th Floor
)
)
)

1 WILLIAM CHAMBERLAIN, on behalf of)
himself and all other similarly situated,) No. 18-cv-04876-EMC
2)
3 Plaintiff,)
4)
5 v.)
6 TESLA, INC., and ELON MUSK,)
7 Defendants.)
8)

9 JOHN YEAGER, Individually and on)
Behalf of All Others Similarly Situated,) No. 18-cv-04912-EMC
10)
11 Plaintiff,)
12)
13 v.)
14 TESLA, INC. and ELON MUSK,)
15 Defendants.)
16)

17 CARLOS MAIA, on behalf of himself and)
all others similarly situated,) No. 18-cv-04939-EMC
18)
19 Plaintiff,)
20)
21 v.)
22 TESLA, INC. and ELON R. MUSK,)
23 Defendants.)
24)
25)
26)
27)
28)

KEWAL DUA, Individually and on Behalf)
of All Others Similarly Situated,) No. 18-cv-04948-EMC
))
Plaintiff,))
))
v.))
))
TESLA, INC. and ELON MUSK,))
))
Defendants.))
))
)

JOSHUA HORWITZ, Individually and on)
Behalf of All Others Similarly Situated,) No. 18-cv-05258-EMC
))
Plaintiff,))
))
v.))
))
TESLA, INC. and ELON R. MUSK,))
))
Defendants.))
))
)

ANDREW E. LEFT, Individually and on)
Behalf of All Others Similarly Situated,) No. 18-cv-05463-EMC
))
Plaintiff,))
))
v.))
))
TESLA, INC., and ELON R. MUSK,))
))
Defendants.))
))
)

1 ZHI XING FAN, Individually and On)
 2 Behalf of All Others Similarly Situated,) No. 18-cv-05470-EMC
 3)
 4 Plaintiff,)
 5)
 6 v.)
 7)
 8 TESLA, INC. and ELON R. MUSK,)
 9)
 10 Defendants.)
 11)

12 SHAHRAM SODEIFI, Individually)
 13 and on behalf of all others similarly) No. 18-cv-05899-EMC
 14 situated,)
 15)
 16 Plaintiff,)
 17)
 18 v.)
 19)
 20 TESLA, INC., a Delaware)
 21 corporation, and ELON R. MUSK, an)
 22 individual,)
 23)
 24 Defendants.)
 25)
 26)
 27)
 28)

1 I, Ramzi Abadou, hereby declare as follows:

2 1. I am a member in good standing of the bar of the State of California and am admitted
3 to this District.

4 2. I submit this Second Declaration, together with the attached exhibits, in further
5 support of the Motion of Bridgestone Investment Corporation Limited (“Bridgestone”) to
6 Consolidate the Related Actions, to appoint Bridgestone to serve as Lead Plaintiff on behalf of the
7 Class in this Action and to approve its selection of Kahn Swick & Foti, LLC as Lead Counsel. I am
8 fully familiar with the facts set forth herein.

9 3. Attached hereto as **Exhibit 1** is a true and correct copy of Tempus International Fund
10 SPC’s profile page.

11 4. Attached hereto as **Exhibit 2** is a true and correct copy of *Bloomberg’s* Company
12 Overview of Opportunity Unique Hedge Fund.

13 5. Attached hereto as **Exhibit 3** is a true and correct copy of One Minute Tick History
14 for Tesla securities.

15 6. Attached hereto as **Exhibit 4** is a true and correct copy of an article dated July 6,
16 2009 published by *Globo Online* (Brazil) accompanied by its certified translation.

17 7. Attached hereto at **Exhibit 5** is a true and correct copy of price and volume
18 information for Tesla securities.

19 8. Attached hereto as **Exhibit 6** is a true and correct copy of the definition of “Short
20 Sales” from the United States Securities and Exchange Commission (“SEC”).

21 9. Attached hereto as **Exhibit 7** is a true and correct copy of a translated article
22 published by *InfoMoney* dated July 21, 2016 titled “GoPro, Tesla, Best Buy and 13 other foreign
23 companies can be traded on Bovespa.”

24 10. Attached hereto as **Exhibit 8** is a true and correct copy of an article published on
25 *CNBC.com* dated March 2, 2016 entitled “Citron exec: This is Tesla’s biggest problem.”
26
27

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing facts are true and correct.

3 Executed this 23rd day of October, 2018, at San Francisco, CA.

4
5 /s/ Ramzi Abadou
6 RAMZI ABADOU
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